

**THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**MICHAEL DAVID SILLS and MARY
SILLS,**

Plaintiffs,

v.

CASE NO: 3:23-CV-00478

**SOUTHERN BAPTIST CONVENTION, a
non-profit corporation; DR. ED LITTON,
Individually, and as agent and/or employee of
SOUTHERN BAPTIST CONVENTION;
LIFEWAY CHRISTIAN RESOURCES OF
THE SOUTHERN BAPTIST CONVENTION,
a non-profit corporation; JENNIFER LYELL,
Individually and as agent and/or employee of
LIFEWAY CHRISTIAN RESOURCES OF
SOUTHERN BAPTIST CONVENTION and
SOUTHERN BAPTIST CONVENTION;
ERIC GEIGER, Individually and as agent
and/or employee of LIFEWAY CHRISTIAN
RESOURCES OF THE SOUTHERN
BAPTIST CONVENTION and SOUTHERN
BAPTIST CONVENTION;
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION, a
non-profit corporation; BART BARBER,
Individually and as agent and/or employee of
SOUTHERN BAPTIST CONVENTION;
WILLIE MCLAURIN, Individually and as
agent and/or employee of SOUTHERN
BAPTIST CONVENTION and EXECUTIVE
COMMITTEE OF THE SOUTHERN
BAPTIST CONVENTION; ROLLAND SLADE,
Individually and as agent and/or employee of
SOUTHERN BAPTIST CONVENTION and
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION;
THE SOUTHERN BAPTIST THEOLOGICAL
SEMINARY, a non-profit corporation;
DR. R. ALBERT MOHLER, Individually and
as agent and/or employee of THE SOUTHERN
BAPTIST THEOLOGICAL SEMINARY and
SOUTHERN BAPTIST CONVENTION;**

**SOLUTIONPOINT INTERNATIONAL, INC.,]
a corporation, individually and d/b/a]
GUIDEPOST SOLUTIONS; and]
GUIDEPOST SOLUTIONS, LLC, a limited]
liability corporation and agent of the Southern]
Baptist Convention.]
Defendants.]**

MOTION FOR PRO HAC VICE

Byron Leet files this motion requesting admission *pro hac vice* to serve as counsel for Defendants The Southern Baptist Theological Seminary and Dr. R. Albert Mohler, Individually and as an agent and/or employee of The Southern Baptist Theological Seminary, and in support thereof, states as follows:

1. Byron Leet is currently a member in good standing of the state bar of the State of Kentucky. As demonstrated by the attached Certificate of Good Standing, Mr. Leet is currently admitted and in good standing to practice law in the state courts of Kentucky. See Exhibit 1.
2. Byron Leet is admitted to practice before all courts in the State of Kentucky. There have been no disciplinary actions or investigations instituted against him. See Affidavit, attached hereto as Exhibit 2.
3. Mr. Leet seeks admission to appear *pro hac vice* in this case to represent Defendants The Southern Baptist Theological Seminary and Dr. R. Albert Mohler, Individually and as an agent and/or employee of The Southern Baptist Theological Seminary, in association with James C. Bradshaw III, who is admitted to practice before this Court and who is a member in good standing with the bar of the State of Tennessee.
4. Mr. Leet has read and will comply will all rules of the Court and agrees to be subject to the rules of the courts of Tennessee.

WHEREFORE, PREMISES CONSIDERED, Byron Leet respectfully moves this Court to grant admission *pro hac vice*, as a non-resident attorney before the bar of this Court for all

proceedings on behalf of the Defendants The Southern Baptist Theological Seminary and Dr. R. Albert Mohler, Individually and as an agent and/or employee of The Southern Baptist Theological Seminary in connection with the above referenced civil action. A proposed Order permitting *pro hac vice* admission is also submitted herewith.

Respectfully submitted,

/s/ James C. Bradshaw III

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the following Notice of Appearance was emailed to counsel via the Court's Electronic Filing System (ECF) on this the 6th day of June, 2023:

Gary E. Brewer, #942 BREWER AND TERRY, P.C.	George H. Cate, III Kimberly M. Ingram- Hogan Bradley Arant Boult Cummings LLP
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<p>Shannon M. McNulty CLIFFORD LAW OFFICES, P.C. 120 N. LaSalle Street, 36th Floor Chicago, Illinois 60602 smm@cliffordlaw.com</p>	<p><i>Counsel for Defendant Eric Geiger</i> John R. Jacobson, Esq. Katherine R. Klein, Esq. Riley & Jacobson, PLC 1906 West End Avenue Nashville, Tennessee 37203 jjacobson@rjfirm.com kklein@rjfirm.com</p>
<p><i>Counsel for Plaintiffs</i> Ronald G. Harris Philip N. Elbert Olivia R. Arboneaux Neal & Harwell, PLC 1201 Demonbreun St., Suite 1000 Nashville, TN 37203 rharris@nealharwell.com pelbert@nealharwell.com oarboneaux@nealharwell.com</p>	<p><i>Counsel for Defendants Mintz & Gold, LLP</i> Steven G. Mintz, Esq. Terence W. McCormick, Esq. 600 Third Avenue, 25th Florr New York, NY 10016 mintz@mintzandgold.com mccormick@mintzandgold.com</p>

/s/ James C. Bradshaw III